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Hearing Date: Sept. 14, 2022
Objections Date: June 13, 2022
Reply Date: July 28, 2022

Attorneys for QS Finance Ltd.
(formerly known as Quilvest Finance Ltd.)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

QUILVEST FINANCE LTD.,

Defendant.

Adv. Pro. No. 11-02538 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in
Support of Defendant's Motion to Dismiss Plaintiff's Complaint, the supporting Declaration

of Thomas E. Lynch dated April 12, 2022 (including the exhibits attached thereto), and all prior pleadings and proceedings herein, Defendant QS Finance Ltd. (formerly known as Quilvest Finance Ltd.) will move this Court for an order dismissing the Complaint filed by Irving Picard as Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, pursuant to Rules 8(a), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Stipulation and Order entered on March 1, 2022, oppositions to the motion to dismiss, if any, shall be filed on or before June 13, 2022 and replies in further support of the motion shall be filed on or before July 28, 2022.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgement by this Court.

Dated: April 12, 2022
New York, New York

By: /s/ Thomas E. Lynch
Thomas E. Lynch
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